

Michael P. Balaban State Bar No. 9370
LAW OFFICES OF MICHAEL P. BALABAN
10726 Del Rudini Street
Las Vegas, NV 89141
(702) 586-2964
Fax: (702) 586-3023
E-Mail: mbalaban@balaban-law.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TONYA HALE,)	CASE NO. 2:19-cv-00780-JCM-VCF
)	
Plaintiff,)	UNOPPOSED MOTION TO EXTEND
)	TIME FOR DEFENDANTS TO FILE
)	RESPONSIVE PLEADINGS TO
)	PLAINTIFF'S COMPLAINT
vs.)	
)	
THE COSMOPOLITAN OF LAS VEGAS;)	
NV PROPERTY 1, LLC d/b/a)	
THE COSMOPOLITAN OF LAS VEGAS,)	
a Nevada Limited Liability Company;)	
RICHARD SHERMAN, an individual,)	(Second Request)
)	
Defendants.)	
)	

COMES NOW the Plaintiff, Tonya Hale ("Plaintiff" or "Hale"), and pursuant to Fed. R. Civ. P. 6(b), respectfully submits this Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint until August 30, 2019. One previous request for extension has been made and this motion is submitted prior to the expiration of the allowed period for responsive pleadings.

1. The current date for responsive pleadings on behalf of the respective Defendants is July 31, 2019 and has not yet expired. Plaintiff understands that both of the Defendants deny liability in this matter.

2. The Parties through their counsel have met to discuss this matter and believe it to be beneficial to continue their discussions to address the issues raised in this case.

3. The Parties jointly request an extension of time for all Defendants to file responsive pleadings through August 30, 2019.

4. Accordingly, there is good cause to postpone the responsive pleading deadline since doing so will allow the Parties to effectively use their resources to attempt to reach a potential resolution, will further the ends of justice by affording the Defendants time to adequately respond to the claims and allegations in the Complaint if resolution is not reached, and will promote judicial economy.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint until August 30, 2019.

The undersigned, counsel of record for Plaintiff TONYA HALE certify that there are no known interested parties other than those participating in the case.

Dated: July 26, 2019

Respectfully submitted,

LAW OFFICES OF MICHAEL P. BALABAN

BY: /s/ Michael P. Balaban
Michael P. Balaban, Esq.
LAW OFFICES OF MICHAEL P. BALABAN
10726 Del Rudini Street
Las Vegas, NV 89141

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ORDERED, that the Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint be, and hereby is, GRANTED, and it is

IT IS SO ORDERED

DATED: August 1, 2019